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10 Attorneys for Defendants
ESTABLISHMENT LABS HOLDINGS
INC. (erroneously sued as
11 ESTABLISHMENT LABS INC.) and
MOTIVA USA LLC
12

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15

16 RAMIN KHADEM,

17 Plaintiff,

18 v.

19 ESTABLISHMENT LABS INC.,
MOTIVA USA LLC, and DOES 1-50
20 inclusive,

21 Defendants.
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Case No. 2:23-cv-1044

**DEFENDANT'S NOTICE OF
RELATED CASES**

[L.R. 83-1.3]

Complaint filed: December 19, 2022

1 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
2 CENTRAL DISTRICT OF CALIFORNIA:

3 Pursuant to Central District of California Local Rule 83-1.3, Defendant's
4 ESTABLISHMENT LABS HOLDINGS INC. (erroneously sued as
5 ESTABLISHMENT LABS INC.) and MOTIVA USA LLC ("Defendant's") hereby
6 avers that, to its knowledge, no action previously filed or currently pending in the
7 Central District appears to arise from the same or closely related transactions,
8 happenings or events as those alleged in Plaintiff Ramin Khadem's pending lawsuit.

9 To Defendant's knowledge, no action previously filed or currently pending in
10 the Central District appears to call for determination of the same or substantially
11 similar questions of law and fact or will entail substantial duplication of labor if heard
12 by different judges.

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14
15 Dated: February 10, 2023

Respectfully submitted,

LITTLER MENDELSON, P.C.

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18 /s/ Heather M. Vigil

19 Heather M. Vigil
Shelley L. Murray

20 Attorneys for Defendants
21 ESTABLISHMENT LABS HOLDINGS
22 INC. (erroneously sued as
23 ESTABLISHMENT LABS INC.) and
24 MOTIVA USA LLC
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PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18, and not a party to the within action. My business address is 18565 Jamboree Road, Suite 800, Irvine, California 92612.

On February 10, 2023, I served the foregoing document(s) described as:

DEFENDANT'S NOTICE OF RELATED CASES

[L.R. 83-1.3]

on the interested parties by placing a true and correct copy thereof in a sealed envelope addressed as follows:

Robin Montes, Esq.
LAW OFFICES OF ROBIN MONTES
1114 Maryland Dr.
Vista, CA 92083
Phone: 760.945.3148
Fax: 760.945.7487

Attorney for Plaintiff RAMIN KHADEM

☐ **VIA ELECTRONIC MAIL WHERE INDICATED:** I served the foregoing document described by emailing to it each of the aforementioned electronic mail addresses and the transmission was reported as complete and without error. My email address is kgarcia@littler.com.

☒ **BY MAIL:** I caused such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Irvine, California. I am readily familiar with the practice of Littler Mendelson for collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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BY FACSIMILE: I caused said document to be transmitted to a facsimile machine maintained by the office of the addressee(s) at the facsimile machine number(s) indicated. Said facsimile number(s) are the most recent numbers appearing on documents filed and served by the addressee(s). I received electronic confirmation from the facsimile machine that said document was successfully transmitted without error. A copy of said electronic confirmation is maintained in this office.

☐

BY OVERNIGHT DELIVERY: I am readily familiar with the practice of Littler Mendelson for the collection and processing of correspondence for overnight delivery and know that the document(s) described herein will be picked up at Littler Mendelson's office by a Federal Express representative, or deposited in a box or other facility regularly maintained by the overnight delivery carrier.

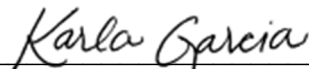
☐

HAND DELIVERY: by directing _____ to personally deliver a copy of the document listed above to the person(s) at the address(es) set forth below.

☒

FEDERAL: I declare under penalty of perjury under the laws of the United States of America that the above is true and correct and that I took said action(s) at the direction of a licensed attorney authorized to practice before this Federal Court.

Executed on February 10, 2023, at Irvine, California.



Karla Garcia

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